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August 7, 2025

FILED ON ECF VIA LETTER-MOTION

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2203
New York, NY 10007

> Re: ***John Doe v. Andrew Farkas and Angelica Parker**, Case No. 25 Civ. 4738*
> **Joint Letter-Motion to Extend Deadline to File Joint Letter and Proposed**
> **Case Management Plan And Scheduling Order, and to Adjourn Initial Status**
> **Conference**

Dear Judge Abrams:

This Firm represents Plaintiff John Doe (proceeding under a pseudonym pursuant to Court order) ("Plaintiff") in the above-referenced matter. We submit this letter motion jointly on behalf of Plaintiff and Defendant Andrew Farkas, pursuant to Rule 1.D. of Your Honor's Individual Rules & Practices in Civil Cases, to request an extension of the deadlines set forth in the Court's June 9, 2025 Order and Notice of Initial Conference (ECF No. 5), including (1) an extension of time from August 8, 2025 to August 22, 2025 for the parties to submit a joint status letter setting forth the nature of the case and a proposed case management plan and scheduling order, and (2) an adjournment of the initial status conference from August 15, 2025 at 1:30 p.m. to August 27, 2025 or another date after Labor Day as the Court's schedule permits.

As counsel for Defendant Andrew Farkas noted in their July 30, 2025 letter motion for extension of time to respond to the complaint (ECF No. 14), the parties have been in continuing settlement discussions, and in light of those discussions, the Court extended Defendant Farkas's time to respond to the Complaint to August 11, 2025. (ECF No. 15.) As a result, the parties' joint status letter and proposed case management plan is currently due before Defendant Farkas has fleshed out his anticipated defense and while the parties are actively engaged in efforts to reach a settlement before the August 11 deadline for Defendant to respond to the Complaint. The parties submit that it would be most beneficial to their settlement efforts, and to the orderly progression of the case (in the event that a settlement is not reached), to extend the time for the parties to submit their joint status letter and proposed case management plan and scheduling order, and likewise to adjourn the date of the initial status conference, until after Defendant's upcoming deadline to respond to the Complaint. This is the parties' first request to adjourn these deadlines and the date of the initial status conference, and the adjournment of these deadlines will not affect any other scheduled dates in this case.

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Accordingly, the parties jointly request that the Court (1) extend the deadline for the parties to submit a joint status letter setting forth the nature of the case and a proposed case management plan and scheduling order from August 8, 2025 to August 22, 2025, and (2) adjourn the initial status conference from August 15, 2025 at 1:30 p.m. to August 27, 2025 (at a time that is convenient for the Court) or another date and time after Labor Day as the Court's schedule permits.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ Christine A. Amalfe

Christine A. Amalfe

cc: Counsel to all parties (via ECF)

Application granted. The conference previously scheduled for August 15, 2025 is hereby adjourned to September 5, 2025 at 11:00 a.m. The parties shall submit a joint letter and proposed case management plan and scheduling order no later than one week in advance of the conference. To the extent the parties are unable to settle the case themselves, they should advise the Court whether further settlement discussions through the district's court-annexed mediation program or before a magistrate judge would be productive at this time.

SO ORDERED.

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Hon. Ronnie Abrams
August 8, 2025